

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
5 melissabaily@quinnemanuel.com
6 James Judah (Bar No. 257112)
7 jamesjudah@quinnemanuel.com
8 Lindsay Cooper (Bar No. 287125)
9 lindsaycooper@quinnemanuel.com
10 50 California Street, 22nd Floor
11 San Francisco, California 94111-4788
12 Telephone: (415) 875-6600
13 Facsimile: (415) 875-6700

14
15 Marc Kaplan (*pro hac vice*)
16 marckaplan@quinnemanuel.com
17 191 N. Wacker Drive, Ste 2700
18 Chicago, Illinois 60606
19 Telephone: (312) 705-7400
20 Facsimile: (312) 705-7401

21 *Attorneys for Google LLC*

22 UNITED STATES DISTRICT COURT
23
24 NORTHERN DISTRICT OF CALIFORNIA
25
26 SAN FRANCISCO DIVISION

27 GOOGLE LLC,
28 Plaintiff,
vs.
SONOS, INC.,
Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 463)**

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1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
 8 463) filed in connection with Sonos’s Motion to Strike Portions of Google’s Expert Invalidity and
 9 Noninfringement Reports (“Motion to Strike”) (Dkt. No. 464). If called as a witness, I could and
 10 would testify competently to the information contained herein.

11 3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Motion to Strike	Portions highlighted in blue and outlined in red boxes	Portions outlined in red boxes	Google
Exhibit A to Sonos’s Motion	Entire Document	Portions outlined in red boxes	Google
Exhibit B to Sonos’s Motion	Entire Document	Portions outlined in red boxes	Google
Exhibit C to Sonos’s Motion	Entire Document	Portions outlined in red boxes	Google
Exhibit E to Sonos’s Motion	Portions outlined in red boxes	Portions highlighted in yellow	Google
Exhibit I to Sonos’s Motion	Entire Document	Portions outlined in red boxes	Google
Exhibit J to Sonos’s Motion ¹	Portions outlined in red boxes	Portions highlighted in yellow	Google and Sonos

27 ¹ Because Sonos has sought to seal portions of this document, Google has not filed a public
 28 redacted version.

1	Exhibit J to Sonos's Motion	Remainder of document	Portions highlighted in yellow	Google
2	Exhibit K to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google
3	Exhibit L to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google
4	Exhibit U to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google
5	Exhibit V to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google
6	Exhibit W to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google
7	Exhibit X to Sonos's Motion	Entire Document	Portions outlined in red boxes	Google

11 4. I understand that the Court analyzes sealing requests in connection with motions to
 12 strike pursuant to the “good cause” standard for non-dispositive motions. *See, e.g., Mendell v. Am.*
 13 *Med. Response, Inc.*, No. 19-CV-01227-BAS-KSC, 2021 WL 398486, at *2 (S.D. Cal. Feb. 3, 2021).
 14 I further understand that courts have found it appropriate to seal documents that contain “business
 15 information that might harm a litigant’s competitive standing.” *Nixon v. Warner Commc’ns, Inc.*, 435
 16 U.S. 589, 589-99 (1978).

17 5. The portions of the Motion to Strike outlined in red boxes contain references to
 18 Google’s confidential business information and trade secrets, including details regarding the
 19 architecture and technical operation of Google’s products. The specifics of how these functionalities
 20 operate is confidential information that Google does not share publicly. Thus, I understand that the
 21 public disclosure of such information could lead to competitive harm to Google, as competitors could
 22 use these details regarding the architecture and functionality of Google’s products to gain a
 23 competitive advantage in the marketplace with respect to their competing products. Google has
 24 therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY
 25 under the protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be
 26 sufficient because the information sought to be sealed is Google’s confidential business information
 27 and trade secrets but has been utilized by the Sonos in support of its Motion to Strike.
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1 6. The portions of the Exhibit A outlined in red boxes contain references to Google's
2 confidential business information and trade secrets, including details regarding the architecture and
3 technical operation of Google's products. The specifics of how these functionalities operate is
4 confidential information that Google does not share publicly. Thus, I understand that the public
5 disclosure of such information could lead to competitive harm to Google, as competitors could use
6 these details regarding the architecture and functionality of Google's products to gain a competitive
7 advantage in the marketplace with respect to their competing products. Google has therefore
8 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the
9 protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient
10 because the information sought to be sealed is Google's confidential business information and trade
11 secrets but has been utilized by the Sonos in support of its Motion to Strike.

12 7. The portions of the Exhibit B outlined in red boxes contain references to Google's
13 confidential business information and trade secrets, including details regarding the architecture and
14 technical operation of Google's products. The specifics of how these functionalities operate is
15 confidential information that Google does not share publicly. Thus, I understand that the public
16 disclosure of such information could lead to competitive harm to Google, as competitors could use
17 these details regarding the architecture and functionality of Google's products to gain a competitive
18 advantage in the marketplace with respect to their competing products. Google has therefore
19 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the
20 protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient
21 because the information sought to be sealed is Google's confidential business information and trade
22 secrets but has been utilized by the Sonos in support of its Motion to Strike.

23 8. The portions of the Exhibit C outlined in red boxes contain references to Google's
24 confidential business information and trade secrets, including source code and details regarding the
25 architecture and technical operation of Google's products. The specifics of how these functionalities
26 operate is confidential information that Google does not share publicly. Thus, I understand that the
27 public disclosure of such information could lead to competitive harm to Google, as competitors could
28 use these details regarding the architecture and functionality of Google's products to gain a

1 competitive advantage in the marketplace with respect to their competing products. Google has
2 therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY
3 under the protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be
4 sufficient because the information sought to be sealed is Google's confidential business information
5 and trade secrets but has been utilized by the Sonos in support of its Motion to Strike.

6 9. The portions of the Exhibit E highlighted in yellow contain references to Google's
7 confidential business information and trade secrets, including details regarding the architecture and
8 technical operation of Google's products. The specifics of how these functionalities operate is
9 confidential information that Google does not share publicly. Thus, I understand that the public
10 disclosure of such information could lead to competitive harm to Google, as competitors could use
11 these details regarding the architecture and functionality of Google's products to gain a competitive
12 advantage in the marketplace with respect to their competing products. Google has therefore
13 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the
14 protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient
15 because the information sought to be sealed is Google's confidential business information and trade
16 secrets but has been utilized by the Sonos in support of its Motion to Strike.

17 10. The portions of the Exhibit I outlined in red boxes contain references to Google's
18 confidential business information and trade secrets, including details regarding the architecture and
19 technical operation of Google's products as well as features that in development that have not been or
20 are in the process of being released. The specifics of how these functionalities operate is confidential
21 information that Google does not share publicly. Thus, I understand that the public disclosure of such
22 information could lead to competitive harm to Google, as competitors could use these details
23 regarding the architecture and functionality of Google's products to gain a competitive advantage in
24 the marketplace with respect to their competing products. Google has therefore designated this
25 information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order
26 (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient because the
27 information sought to be sealed is Google's confidential business information and trade secrets but has
28 been utilized by the Sonos in support of its Motion to Strike.

1 11. Some portions of the Exhibit J highlighted in yellow contain references to Google's
2 confidential business information and trade secrets, including details regarding the architecture and
3 technical operation of Google's products. The specifics of how these functionalities operate is
4 confidential information that Google does not share publicly. Thus, I understand that the public
5 disclosure of such information could lead to competitive harm to Google, as competitors could use
6 these details regarding the architecture and functionality of Google's products to gain a competitive
7 advantage in the marketplace with respect to their competing products. Other portions of Exhibit J
8 highlighted in yellow contain confidential business agreements and licensing negotiations that are not
9 public. I understand that public disclosure of this information would harm Google's competitive
10 standing and its ability to negotiate future agreements by giving competitors access to Google's highly
11 confidential business thinking and asymmetrical information about Google's collaboration strategies
12 to other entities. If such information were made public, I understand that Google's competitive
13 standing would be significantly harmed. Google has therefore designated this information as
14 **HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY** under the protective order (Dkt. No. 92).
15 A less restrictive alternative than sealing would not be sufficient because the information sought to be
16 sealed is Google's confidential business information and trade secrets but has been utilized by the
17 Sonos in support of its Motion to Strike.

18 12. The portions of Exhibit K outlined in red boxes contain references to Google's
19 confidential business information and trade secrets, including source code and excerpts from internal
20 documents detailing the architecture and technical operation of Google's products. The specifics of
21 how these functionalities operate is confidential information that Google does not share publicly.
22 Thus, I understand that the public disclosure of such information could lead to competitive harm to
23 Google, as competitors could use these details regarding the architecture and functionality of Google's
24 products to gain a competitive advantage in the marketplace with respect to their competing products.
25 Google has therefore designated this information as **HIGHLY CONFIDENTIAL—ATTORNEYS'**
26 **EYES ONLY** under the protective order (Dkt. No. 92). A less restrictive alternative than sealing
27 would not be sufficient because the information sought to be sealed is Google's confidential business
28 information and trade secrets but has been utilized by Sonos in support of its Motion to Strike.

1 13. The portions of Exhibit L outlined in red boxes contain references to Google's
2 confidential business information and trade secrets, including source code and excerpts from internal
3 documents detailing the architecture and technical operation of Google's products. The specifics of
4 how these functionalities operate is confidential information that Google does not share publicly.
5 Thus, I understand that the public disclosure of such information could lead to competitive harm to
6 Google, as competitors could use these details regarding the architecture and functionality of Google's
7 products to gain a competitive advantage in the marketplace with respect to their competing products.
8 Google has therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS'
9 EYES ONLY under the protective order (Dkt. No. 92). A less restrictive alternative than sealing
10 would not be sufficient because the information sought to be sealed is Google's confidential business
11 information and trade secrets but has been utilized by Sonos in support of its Motion to Strike.

12 14. The portions of Exhibit U outlined in red boxes contain references to Google's
13 confidential business information and trade secrets, including source code and excerpts from internal
14 documents detailing the architecture and technical operation of Google's products. The specifics of
15 how these functionalities operate is confidential information that Google does not share publicly.
16 Thus, I understand that the public disclosure of such information could lead to competitive harm to
17 Google, as competitors could use these details regarding the architecture and functionality of Google's
18 products to gain a competitive advantage in the marketplace with respect to their competing products.
19 Google has therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS'
20 EYES ONLY under the protective order (Dkt. No. 92). A less restrictive alternative than sealing
21 would not be sufficient because the information sought to be sealed is Google's confidential business
22 information and trade secrets but has been utilized by Sonos in support of its Motion to Strike.

23 15. The portions of Exhibit U outlined in red boxes contain references to Google's
24 confidential business information and trade secrets, including source code and excerpts from internal
25 documents detailing the architecture and technical operation of Google's products. The specifics of
26 how these functionalities operate is confidential information that Google does not share publicly.
27 Thus, I understand that the public disclosure of such information could lead to competitive harm to
28 Google, as competitors could use these details regarding the architecture and functionality of Google's

1 products to gain a competitive advantage in the marketplace with respect to their competing products.
2 Google has therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’
3 EYES ONLY under the protective order (Dkt. No. 92). A less restrictive alternative than sealing
4 would not be sufficient because the information sought to be sealed is Google’s confidential business
5 information and trade secrets but has been utilized by Sonos in support of its Motion to Strike.

6 16. The portions of the Exhibit V outlined in red boxes contain references to Google’s
7 confidential business information and trade secrets, including details regarding the architecture and
8 technical operation of Google’s products as well as features that in development that have not been or
9 are in the process of being released. The specifics of how these functionalities operate is confidential
10 information that Google does not share publicly. Thus, I understand that the public disclosure of such
11 information could lead to competitive harm to Google, as competitors could use these details
12 regarding the architecture and functionality of Google’s products to gain a competitive advantage in
13 the marketplace with respect to their competing products. Google has therefore designated this
14 information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the protective order
15 (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient because the
16 information sought to be sealed is Google’s confidential business information and trade secrets but has
17 been utilized by the Sonos in support of its Motion to Strike.

18 17. The portions of the Exhibit W outlined in red boxes contain references to Google’s
19 confidential business information and trade secrets, including details regarding the architecture and
20 technical operation of Google’s products as well as features that in development that have not been or
21 are in the process of being released. The specifics of how these functionalities operate is confidential
22 information that Google does not share publicly. Thus, I understand that the public disclosure of such
23 information could lead to competitive harm to Google, as competitors could use these details
24 regarding the architecture and functionality of Google’s products to gain a competitive advantage in
25 the marketplace with respect to their competing products. Google has therefore designated this
26 information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the protective order
27 (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient because the
28

information sought to be sealed is Google's confidential business information and trade secrets but has been utilized by the Sonos in support of its Motion to Strike.

3 18. Some portions of the Exhibit X outlined in red boxes contain references to Google's
4 confidential business information and trade secrets, including details regarding the architecture and
5 technical operation of Google's products as well as features that in development that have not been or
6 are in the process of being released. The specifics of how these functionalities operate is confidential
7 information that Google does not share publicly. Thus, I understand that the public disclosure of such
8 information could lead to competitive harm to Google, as competitors could use these details
9 regarding the architecture and functionality of Google's products to gain a competitive advantage in
10 the marketplace with respect to their competing products. Other portions of Exhibit X highlighted in
11 yellow contain confidential business agreements and licensing negotiations that are not public. I
12 understand that public disclosure of this information would harm Google's competitive standing and
13 its ability to negotiate future agreements by giving competitors access to Google's highly confidential
14 business thinking and asymmetrical information about Google's collaboration strategies to other
15 entities. If such information were made public, I understand that Google's competitive standing
16 would be significantly harmed. Google has therefore designated this information as HIGHLY
17 CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order (Dkt. No. 92). A less
18 restrictive alternative than sealing would not be sufficient because the information sought to be sealed
19 is Google's confidential business information and trade secrets but has been utilized by the Sonos in
20 support of its Motion to Strike.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on February 3, 2023, in San Francisco, California.

24 | DATED: February 3, 2023

By: /s/ Jocelyn Ma
Jocelyn Ma